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June 30, 2003

Administrator
U. S. Environmental Protection Agency
P.O. Box 1474
Merrifield, VA 22116

E-mail: chem.rtk@epa.gov; oppt.nci@epa.gov

Attention: Chemicals Right-to Know Program

Re: Submittal of Information for the HPV Program
Submittal of Revised Test Plan for CAS No. 68227-46-3

Dear Administrator:

As part of our agreement to participate in the HPV Challenge Program, PPG submitted a revised Test Plan and Robust Summaries for Propanoic acid, 2-hydroxy-, compd. with 3-[2-(dimethylamino)ethyl] 1-(2-ethylhexyl) (4-methyl-1,3-phenylene)bis[carbamate] (1:1), CAS No. 68227-46-3 on February 13, 2003. This submission was posted on the website with provision for a 60 day comment period.

PPG has reviewed the comments posted to the website concerning this submission, and considered the various suggestions contained in the comments. PPG has subsequently revised the Test Plan. Included with this transmittal letter are the following documents:

- Rationale for Revision of Test Plan Following Review of Comments on the HPV Challenge Submission for Propanoic acid, 2-hydroxy-, compd. with 3-[2-(dimethylamino)ethyl] 1-(2-ethylhexyl) (4-methyl-1,3-phenylene)bis[carbamate] (1:1), CAS No. 68227-46-3
- Revised Test Plan for Propanoic acid, 2-hydroxy-, compd. with 3-[2-(dimethylamino)ethyl] 1-(2-ethylhexyl) (4-methyl-1,3-phenylene)bis[carbamate] (1:1) CAS No. 68227-46-3. U. S. EPA HPV Challenge Program Submission February 2003, Revised on June 30, 2003

If you have any questions concerning these materials, please contact me.

Yours truly,

James A. Barter, Ph.D., D.A.B.T.
Director, Environmental Health Sciences & Toxicology

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PPG Industries, Inc. Rationale for Revision of Test Plan Following Review of Comments on the HPV Challenge Submission for Propanoic acid, 2-hydroxy-, compd. with 3-[2-(dimethylamino)ethyl] 1-(2-ethylhexyl) (4-methyl-1,3-phenylene)bis[carbamate] (1:1), CAS No. 68227-46-3

PPG has reviewed information and suggestions provided by the Agency and other external reviewers of the HPV Challenge Submission for this test substance. Based on review and consideration of the comments submitted, PPG has revised the Test Plan for this material. The HPV Test Plan has been revised in the following areas:

1. Physical/Chemical Properties

PPG will conduct measured water solubility as proposed in the original Test Plan and revise the relevant estimated endpoints for physical/chemical properties as suggested in the comments.

2. Ecotoxicity

PPG agrees with the suggestions that the proposed ecotoxicity testing be modified, because the estimated Log Kow is greater than 4.2. In its guidance on data development for the HPV program, EPA recommends for chemicals determined to have a Log Kow equal to or greater than 4.2. that the following tests should be conducted: chronic toxicity testing to *Daphnia* (in place of acute toxicity testing to fish and *Daphnia*) and toxicity testing to algae.

However, the EPA guidance further indicates that acute aquatic toxicity testing may be relevant for chemicals that are dispersible in water. Since the estimated Log Kow value of this test material is greater than 4.2 and the material would be somewhat dispersible, PPG will conduct the acute toxicity to *Daphnia*, in addition to the chronic toxicity to *Daphnia* and the acute toxicity to algae discussed above. PPG will not conduct the acute fish toxicity test (as proposed in the original Test Plan) since the data from acute toxicity testing with *Daphnia* and algae will provide information on acute ecotoxicity. This revised testing program should provide sufficient information for the ecotoxicity end point.

3. Use and Exposure Information

Based on suggestions in the comments, additional information regarding manufacture, transport and use, of the test substance has been included in the revised test plan.